

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELVIN HUNTER WILLIAMS,

Defendant.

NO. MJ21-322

MOTION FOR DETENTION

The United States moves for pretrial detention of the Defendant, pursuant to
18 U.S.C. 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this
case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. 3156).
- ☒ Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence
of ten years or more.
- ☐ Crime with a maximum sentence of life imprisonment or death.
- ☐ Drug offense with a maximum sentence of ten years or more.

- 1 ☐ Felony offense and defendant has two prior convictions in the four
2 categories above, or two State convictions that would otherwise fall within
3 these four categories if federal jurisdiction had existed.
- 4 ☐ Felony offense involving a minor victim other than a crime of violence.
- 5 ☐ Felony offense, other than a crime of violence, involving possession or use
6 of a firearm, destructive device (as those terms are defined in 18 U.S.C.
7 921), or any other dangerous weapon.
- 8 ☐ Felony offense other than a crime of violence that involves a failure to
9 register as a Sex Offender (18 U.S.C. 2250).
- 10 ☒ Serious risk the defendant will flee.
- 11 ☒ Serious risk of obstruction of justice, including intimidation of a
12 prospective witness or juror.

13 2. **Reason for Detention.** The Court should detain defendant because there
14 are no conditions of release which will reasonably assure (check one or both):

- 15 ☒ Defendant's appearance as required.
- 16 ☒ Safety of any other person and the community.

17 3. **Rebuttable Presumption.** The United States will invoke the rebuttable
18 presumption against defendant under 3142(e). The presumption applies because:
19

- 20 ☒ Probable cause to believe defendant committed an offense listed in
21 18 U.S.C. § 2332b(g)(5)(B).
22

23 **Legal authority:** The Bail Reform Act, at Title 18, United States Code,
24 Section 3142(e)(3)(C), provides a rebuttable presumption for detention in
25 cases like the instant one, where a defendant is charged with an offense
26 listed in 18 U.S.C. § 2332b(g)(5)(B). Providing Material Support to a
27 Designated Foreign Terrorist Organization, in violation of Title 18, United
28 States Code, Section 2339B, is such an offense.

conduct the detention hearing:

☐ After a continuance of ____ days (not more than 3)

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